

UNITED STATES DISTRICT COURT

for the  
Southern District of Ohio

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

Case No. 1:20-mj-445

Priority Mail parcel tracking number 9505 5265 1046 0163 3982 44,  
postmarked June 11, 2020, weighing 3 pounds 1 ounces, addressed Cam bepjo,  
6670 River Rd, Cincinnati, OH 45233 with a return address of Joey Martinez,  
1200 S Broadway Apt #300, Los Angeles, CA 90015

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Priority Mail parcel tracking number 9505 5265 1046 0163 3982 44

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

Controlled Substances, materials and documents reflecting the distribution of controlled substances through the U.S. Mails, including money and/or monetary instruments paid for controlled substances

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of: Title 21

Code Section	Offense Description
841 (a) (1), 843 (b) & 846	Conspiracy to distribute a controlled substance
	Possession with intent to distribute a controlled substance

The application is based on these facts:

See attached affidavit of U.S. Postal Inspector O'Neill

- ☒ Continued on the attached sheet.  
☐ Delayed notice \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Karen L. O'Neill, U. S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 6/23/2020

Judge's signature

City and state: Cincinnati, Ohio

Honorable Karen L. Litkovitz  
United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, KAREN O'NEILL, HAVING BEEN DULY SWORN, DEPOSE AND STATE: I am a United States Postal Inspector, having been so employed since March 2003.

1. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the Postal Inspection Service with investigative responsibility for southwest Ohio, northern Kentucky, and southeast Indiana. Part of my investigative responsibility involves the use of the United States Mail in the transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.

2. Your affiant has become aware that drug traffickers frequently use Express Mail, a business-oriented overnight service offered by the United States Postal Service, to transport narcotics and other dangerous controlled substances, and their proceeds or instrumentalities from the sale of the controlled substances. Your affiant has also become aware that drug traffickers frequently use Priority Mail with delivery confirmation, a 2-3 day service offered by the United States Postal Service. As a result of investigations and successful controlled substance prosecutions where the Mail was used, your affiant has learned of certain characteristics indicative of other Mail items previously identified as containing narcotics or other dangerous controlled substances, their proceeds or instrumentalities from the sale of the controlled substances. Some of these characteristics include, but are not necessarily limited to or used on every occasion, the mailer using different post offices on the same day to send parcels, false or non-existent return address, addressee is not known to receive mail at the listed delivery or sender address, the package is heavily taped, the package is mailed from a known drug source location, labeling information contains misspellings, unusual odors emanating from the package, and the listed address is located in an area of known or suspected drug activity.

3. On or about June 13, 2020, your affiant was contacted by the manager at the Western Hills Post Office, Cincinnati, Ohio regarding Priority Mail parcel postal tracking number 9505 5265 1046 0163 3982 44 (PARCEL 1) addressed to Cam bepjo, 6670 River Rd, Cincinnati, OH 45233 with a return address of Joey Martinez, 1200 S Broadway Apt #300, Los Angeles, CA 90015. PARCEL 1 was mailed from

southern California, a known drug source area. Your affiant requested the parcel be placed in a secure location for further investigation.

4. Your affiant knows that in November-December 2019 she obtained federal search warrants for multiple parcels addressed to 6670 River Rd, Cincinnati, OH 45233 that were found to contain marijuana, hashish and THC (Tetrahydrocannabinol - a schedule I controlled substance) cartridges. Those parcels were addressed to "Carmen Bepio" and "Carmen "Bepio" and were also coming from southern California. Your affiant identified "Carmen Belperio" as the individual that resides at the River Road address. The contents were seized by the government.

5. Your affiant did a check in CLEAR regarding the return address on PARCEL 1. CLEAR is a database that is used by law enforcement as a tool to identify person/business and address information. According to CLEAR, the return address 1200 S Broadway Los Angeles, CA 90015 exists but your affiant could not associate apartment 300 at this location.

6. On or about June 14, 2020, your affiant did a check of postal business records and learned that the same person or persons that were checking PARCEL 1 via tracking number had also checked on parcels addressed to 5211 Washington Blvd Suite 2, Commerce, CA 90040 and 5619 Lankershim Blvd, North Hollywood, CA 91601. Your affiant obtained address history for the aforementioned addresses and learned that at least 18 parcels had been mailed from southern Ohio and northern Kentucky since May 1, 2020. Further investigation showed that 5211 Washington Blvd Suite 2, Commerce, CA 90040 (SUBJECT ADDRESS 1) is a UPS store and 5619 Lankershim Blvd, North Hollywood, CA 91601 (SUBJECT ADDRESS 2) is the Letter Locker. Post Office boxes can be rented at both of these locations. Your affiant knows through her training and experience that sometimes an individual will rent a box or uses an address of a business to elude law enforcement and make a parcel appear to be legitimate instead of the use of their residence address. Your affiant requested to be notified when parcels were mailed to SUBJECT ADDRESS 1 and 2.

7. On or about June 15, 2020, your affiant obtained PARCEL 1 from the Western Hills Post Office.

8. Cincinnati Police Department Specialist Mike Harper was contacted to arrange for a narcotic canine to check PARCEL 1. Your affiant requested Specialist Harper respond to the Loveland Post Office, Loveland, Ohio where PARCEL 1 was placed in a controlled area and presented to narcotic



canine, "Cairo". "Cairo" alerted positively to the presence or odor of a controlled substance or their proceeds or instrumentalities upon PARCEL 1. Your affiant knows that Specialist Harper and narcotic canine "Cairo" train regularly and are certified annually through the Ohio Peace Officer Training Academy. Your affiant has presented multiple parcels to Specialist Harper and canine "Cairo" which has resulted in successful seizures of a quantity of a narcotic or other dangerous controlled substance and their proceeds or instrumentalities therefore your affiant considers them to be reliable. Attached herewith, and made part hereof by reference, is a photocopy of the narcotic canine handler's record of examination.

9. Your affiant contacted the Cincinnati Postal Processing & Distribution Center (P&DC) and requested to be contacted if any parcels arrived at their facility going to SUBJECT ADDRESS 1 or 2.

10. Your affiant was contacted by the Cincinnati P&DC regarding Priority Mail Express parcel label number EJ196853235US (PARCEL 2) addressed to A1 Stickers and decals, 5211 E Washington Blvd Suite 2 #276, Commerce, CA 90040 with a return address of 513 East Johns St, Blanchester, OH 45107 and Priority Mail Express parcel label number EJ205377899US (PARCEL 3) addressed to West Coast Consulting, 5619 Lankershim Blvd #1919, N Hollywood, CA 91601 with a return address of Brandon Adams, 320 Obbie Cook, Sanders, KY 41083. PARCEL 2 has a legitimate return address but no sender name. Your affiant requested PARCEL 2 and 3 be placed in a secure location for further investigation.

11. Your affiant did a check in CLEAR regarding the business name "A1 Stickers and Decals" and "West Coast Consulting". Your affiant was unable to associate either business with SUBJECT ADDRESS 1 or 2.

12. On or about June 16, 2020, your affiant obtained PARCEL 2 and 3 from the Cincinnati P&DC.

13. Your affiant did a check in postal tracking system and located Priority Mail Express parcel label number EJ395548305US (PARCEL 4) and Priority Mail Express parcel label number EJ356378012US (PARCEL 5). Your affiant contacted the Cincinnati P&DC and learned that PARCEL 4 is addressed to A1 Stickers and Decals, 5211 E Washington Blvd Suite 2 #276, Commerce, CA 90040 with a return address of Charles Wahoff, 454 Kitty Lane, Cincinnati, OH 45238 and PARCEL 5 is addressed to A1 Stickers and decals, 5211 E Washington Blvd Suite 2 #276, Commerce, CA 90040 with a return address of Harrison McKee, 6539 Harrison Ave #218, Cincinnati, OH 45247. Your affiant also learned that Priority Mail parcel tracking number 9405 8036 9930 0768 2443 64 (PARCEL 6) addressed to A1 Stickers and Decals, 5211

E Washington Blvd STE 2, Commerce, CA 90040-3963 with a return address of Ty Haithcock, 502 N West St, Hillsboro, OH 45133-1066 had processed through the P&DC. Your affiant requested PARCEL 4, PARCEL 5 and PARCEL 6 be placed in a secure location for further investigation.

14. On or about June 17, 2020, your affiant obtained PARCEL 4, PARCEL 5 and PARCEL 6 from the Cincinnati P&DC.

15. Your affiant did a check in postal tracking system and located Priority Mail Express parcel label number EJ356376113US (PARCEL 7). Your affiant contacted the Cincinnati P&DC and learned that PARCEL 7 is addressed to A1 Stickers and Decals, 5211 E Washington Blvd Suite 2 #276, Commerce, CA 90040 with a return address of Paige Sanders, 3711 Woodbine Ave, Cin, OH 45211. Your affiant requested PARCEL 7 be placed in a secure area for further investigation.

16. On or about June 18, 2020, your affiant obtained PARCEL 7 from the Cincinnati P&DC.

17. Your affiant did a check in CLEAR regarding the return address on the aforementioned parcels. According to CLEAR, the name "Adams" is associated with the return address on PARCEL 3 and the name "Wahoff" is associated with the return address on PARCEL 4. The sender names on PARCEL 5, PARCEL 6 and PARCEL 7 are not associated with the return addresses.

18. Cincinnati Police Department Specialist Mike Harper was contacted to arrange for a narcotic canine to check PARCEL 2, PARCEL 3, PARCEL 4, PARCEL 5, PARCEL 6 and PARCEL 7. Specialist Harper responded to the Postal Inspection Service office, Cincinnati, Ohio where the parcels were placed in a separate controlled area and presented to narcotic canine, "Cairo". "Cairo" alerted positively to the presence or odor of a controlled substance or their proceeds or instrumentalities upon all of the parcels. Your affiant knows that Specialist Harper and narcotic canine "Cairo" train regularly and are certified annually through the Ohio Peace Officer Training Academy. Your affiant has presented multiple parcels to Specialist Harper and canine "Cairo" which has resulted in successful seizures of a quantity of a narcotic or other dangerous controlled substance and their proceeds or instrumentalities therefore your affiant considers them to be reliable. Attached herewith, and made part hereof by reference, is a photocopy of the narcotic canine handler's record of examination.

19. PARCEL 1 is further identified as follows: a U.S. Postal Service Priority Mail Large Flat Rate cardboard box 12" x 12" x 5 1/2" in size, bearing tracking number 9505 5265 1046 0163 3982 44, weighing 3 pounds 1 ounce, postmarked June 11, 2020; see address information below:

**Sender:** Joey Martinez  
1200 S Broadway Apt #300  
Los Angeles, CA 90015

**Addressee:** Cam bepio  
6670 River Rd  
Cincinnati, OH 45233

20. PARCEL 2 is further identified as follows: a U.S. Postal Service Priority Mail Express Flat Rate envelope 12 1/2" x 9 1/2" in size, bearing label number EJ196853235US, postmarked June 15, 2020; see address information below:

**Sender:** 513 East Johns St  
Blanchester, OH 45107

**Addressee:** A1 Stickers and decals  
5211 Washington blvd Suite 2 #276  
Commerce, CA 90040

21. PARCEL 3 is further identified as follows: a U.S. Postal Service Priority Mail Express Flat Rate cardboard box 11" x 8 1/2" x 5 1/2" in size, bearing label number EJ205377899US, postmarked June 15, 2020; see address information below:

**Sender:** Brandon Adams  
320 Obbie Cook  
Sanders, KY 41083

**Addressee:** West Coast Consulting  
5619 Lankershim Blvd #1919  
N Hollywood, CA 91601

22. PARCEL 4 is further identified as follows: a U.S. Postal Service Priority Mail Express Flat Rate envelope 12 1/2" x 9 1/2" in size, bearing label number EJ395548305US, postmarked June 16, 2020; see address information below:

**Sender:** Charles Wahoff  
454 Kitty Lane  
Cincinnati, OH 45238

**Addressee:** A1 Stickers and Decals  
5211 Washington Blvd Suite 2 #276  
Commerce, CA 90040



23. PARCEL 5 is further identified as follows: a U.S. Postal Service Priority Mail Express Flat Rate envelope 12 1/2" x 9 1/2" in size, bearing label number EJ356378012US, postmarked June 16, 2020; see address information below:

**Sender:** Harrison McKee  
6539 Harrison Ave #218  
Cincinnati, OH 45247

**Addressee:** A1 Stickers and decals  
5211 Washington blvd Suite 2 #276  
Commerce, CA 90040

24. PARCEL 6 is further identified as follows: a U.S. Postal Service Priority Mail Express Flat Rate envelope 12 1/2" x 9 1/2" in size, bearing tracking number 9405 8036 9930 0768 2443 64, postmarked June 16, 2020; see address information below:

**Sender:** Ty Haithcock  
502 N West St  
Hillsboro, OH 45133-1066

**Addressee:** A1 Stickers and Decals  
5211 Washington Blvd STE 2  
Commerce, CA 90040-3963

25. PARCEL 7 is further identified as follows: a U.S. Postal Service Priority Mail Express Tyvek envelope 11 1/2" x 15" in size, bearing label number EJ356376113US, postmarked June 17, 2020; see address information below:

**Sender:** Paige Sanders  
3711 Woodbine Ave  
Cincinnati, OH 45211

**Addressee:** A1 Stickers & Decals  
5211 Washington Blvd Suite 2 #276  
Commerce, CA 90040

26. This information along with the positive alert of narcotic canine "Cairo" is indicative of a drug package or its proceeds.

27. Based on the information contained herein, your affiant believes that contained in PARCEL 1, PARCEL 2, PARCEL 3, PARCEL 4, PARCEL 5, PARCEL 6 and PARCEL 7 is a quantity of a narcotic or other dangerous controlled substance, their proceeds or instrumentalities.

28. The parcels are being secured at the USPIS Field Office, Cincinnati, Ohio pending further investigation.

Therefore, a search warrant to open PARCEL 1, PARCEL 2, PARCEL 3, PARCEL 4, PARCEL 5, PARCEL 6 and PARCEL 7 is requested.

Further, your affiant sayeth naught.

Karell

Karen O'Neill  
Postal Inspector

Subscribed and sworn to and before me this 23 day of June, 2020.

Karen L. Litkovitz

Honorable Karen L. Litkovitz  
United States Magistrate Judge





United States Postal Inspection Service  
Pittsburgh Division

## OFFICER AFFIDAVIT

I, Miki Harper, am and have been employed by the Cincinnati Police Department since 2001. Among other duties, I am currently the assigned handler of narcotics detection canine "Cairo" which is trained and certified in the detection of the presence or odor of narcotics described as follows:

marijuana, cocaine, methamphetamine and heroin

On 6-15-2020, at the request of Postal Inspector K. O'Neill, I responded to Loveland Post Office, where "Cairo" did alert to and indicate upon:

[describe item]

9505 5265 1046 0163 3982 44 addressed to  
Cam Lopez 6670 River Rd Cincinnati OH 45233  
return Lucy Martinez 1200 S Broadway Apt #300  
Los Angeles CA 90015

Which, based upon my training and experience and that of "Cairo", indicates there is contained within or upon the above described item, the presence or odor of a narcotic or other controlled substance.

[Signature] 6-15-20  
(Signature and Date)

[Signature] 6-15-2020  
(Signature and Date)